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PERMITTEE

Florida Roof Recycling, LLC
485 Commerce Way
Longwood, FL 32750

Air Permit No. 0951352-001-AC
Permit Expires: January 31, 2016

Authorized Representative:
Jay Russell, V.P. General Manager

Florida Roof Recycling
Minor Source Air Construction Permit
Initial Construction Permit

This is the final air construction permit, which authorizes construction and installation of a primary and secondary hammer mill grinding system. The proposed work will be conducted at Florida Roof Recycling, which is a Roofing Material Recycling Plant (Standard Industrial Classification No. 5033- Roofing, Siding, and Insulation Materials). The facility is located in Orange County at 8801 Winegard Road in Orlando, Florida. The UTM coordinates are Zone 17, 462.51 km East, and 3145.90 km North.

As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections.

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Unit Specific Conditions
- Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

AIR CONSTRUCTION PERMIT

Executed in Orange County, Florida

Reneé H. Parker (Date)
Environmental Program Supervisor
Air Quality Management
Orange County Environmental Protection Division

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

Jay Russell, Florida Roof Recycling, LLC (jrussell@collisroofing.com)
James Show, P.E. of Record, Grove Scientific and Engineering Company (j_sshow@bellsouth.net)
Sara Greivell, Grove Scientific and Engineering Company (sara@grovescientific.com)
Tom Lubozynski, P.E., Air Program Administrator, FDEP Central District (tom.lubozynski@dep.state.fl.us)
Reneé H. Parker, Air Program Administrator, OCEPD (renee.parker@ocfl.net)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

(Clerk) (Date)

SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

Facility Description

Florida Roof Recycling, LLC is a roofing material recycling facility. The facility is proposing to install a primary and secondary hammer mill grinding system inside a partially enclosed building to process roofing materials into an asphaltic product to be used in the manufacture of road paving material. The facility's total potential PM emissions from the crushing system, including screen and conveyors, will exceed the exemption threshold of 5 tons per year.

Proposed Project

The purpose of this project is for initial construction of a roofing material recycling facility. This project will create the following emissions units.

Facility ID No. 0951352	
ID No.	Emission Unit Description
001	Roofing Material Recycling Process

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- The facility is a natural minor source of particulate matter (PM).

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting & Compliance Authority: The permitting authority for this project is the Orange County Environmental Protection Division (EPD). All documents related to applications for permits to operate emission units and compliance activities such as reports, tests, and notifications shall be submitted to EPD. The mailing address and phone number of the EPD is 800 Mercy Drive, Suite 4, Orlando, FL 32808 and 407-836-1400.
2. Appendices: The following Appendices are attached as part of this permit:
 - a. Appendix A. Citation Formats and Glossary of Common Terms;
 - b. Appendix B. General Conditions;
 - c. Appendix C. Common Conditions; and
 - d. Appendix D. Common Testing Requirements.
3. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
4. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the EPD may grant additional time.
[Rule 62-4.080, F.A.C.]
5. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the EPD. Such permit shall be obtained prior to beginning construction or modification.
[Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
6. Application for Operation Permit: This permit authorizes construction and initial operation to determine compliance with EPD rules. An air operation permit is required for regular operation of the permitted emissions unit. **The permittee shall apply for an air operation permit at least 90 days prior to expiration of this permit.** To apply for an air operation permit, the applicant shall submit the appropriate application form to the EPD, the appropriate fee listed in Rule 62-4.050(4), and such additional information as EPD may by law require.
[Rules 62-4.030, 62-4.050, 62-4.220 F.A.C.]

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS

EU No. 001- Roofing Material Recycling Process

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	<p><u>Roofing Material Recycling Process</u> The process will include receiving truckloads of roofing material, including old roofing shingles, tar paper, and associated debris. Each load will be sorted to remove unwanted wood, metal, and plastic. Each load will be sampled and laboratory analysis conducted to assure that there is no asbestos containing materials in the roofing materials. The roofing material will then be processed through two (2) hammer mills and vibrating screens to achieve the desired product size. A central dust collector is used to control PM emissions from the hammer mills. All equipment is electric. The grinding/crushing process will be conducted inside a partially enclosed building to keep the product dry.</p>

EQUIPMENT

1. Equipment Name: The permittee is authorized to install the following equipment:
 - a. One (1) Kafka portable conveyor picking station;
 - b. One (1) Primary Grinding System- Schutte Model RC-4460 Hammer Mill and vibrating screen with 400 HP Drive and two (2) conveyor belts;
 - c. One (1) Secondary Grinding System- Schutte Model 15200 Hammer Mill and vibrating screen with 300 HP Drive, access platform and two (2) conveyor belts;
 - d. One (1) Finished product conveyor style stacker;
 - e. One (1) Central Dust Collector- CMAXX Cartridge Collector Model CM024, 8000 cfm, 5400 sq. ft. of filter area with pulse jet.[Permit Application received December 20, 2013]

PERFORMANCE RESTRICTIONS

2. Permitted Capacity: The combined process rate for the primary and secondary hammer mills shall not exceed 80 tons per hour of recycled asphalt product.
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; Permit Application received December 20, 2013]
3. Grinding System: The grinding or crushing system shall not process asbestos-containing roofing materials that contain asbestos greater than 1.0 percent, by weight.
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

{Permitting Note: *Category I nonfriable asbestos-containing material (ACM)* means asbestos-containing packings, gaskets, resilient floor covering, and asphalt roofing products containing more than 1.0 percent asbestos as defined in 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference at Rule 62-204.800, F.A.C. }
4. Restricted Operation: The hours of operation of are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

5. Visible Emission (VE) Limitation: Visible emissions from any crusher, grinding mill, screening operation, bucket elevator, transfer point on belt conveyors, bagging operation, storage bin, enclosed truck or railcar loading station, or any other emission point shall be less than 20 percent opacity.
[Rule 62-296.320(4)(b)1., F.A.C.]
6. Unconfined Emissions of Particulate Matter: No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS

EU No. 001- Roofing Material Recycling Process

loading, unloading, storing or handling; without taking the following reasonable precautions to prevent such emissions.

- a. Paving and maintenance of roads, parking areas and yards;
 - b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing;
 - c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities;
 - d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne;
 - e. Landscaping or planting of vegetation;
 - f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter;
 - g. Enclosure or covering of conveyor systems.
- [Rules 62-296.320(4)(c)(1),(2), and (3), F.A.C.]

TESTING REQUIREMENTS

- 7. Initial Compliance Tests: The dust collector’s exhaust and conveyor drop points shall be tested to demonstrate initial compliance with the visible emissions standards specified in Specific Condition 5. The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit.
[Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]
- 8. Compliance Tests After Initial Testing: The dust collector’s baghouse and conveyor drop points shall be tested to demonstrate compliance with the visible emissions standard specified in Specific Condition 5 prior to obtaining a renewed operation permit.
[Rule 62-297.310(7)(a)3, F.A.C.]
- 9. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]
- 10. Test Methods: Required tests shall be performed in accordance with the following reference method.

EPA Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources: Shall be conducted for 30 minutes or the length of the batch/cycle if less than 30 minutes.

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the EPD.
[Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

- 11. Operating Rate During Testing: Testing of emissions shall be conducted within 90 to 100 percent of the maximum permitted operating rate of **80 tons/hr**. If it is impracticable to test at the maximum permitted operating rate, then the emission unit may be tested at a lesser rate. In this case, subsequent emission unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rule 62-297.310(2), F.A.C.]

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS

EU No. 001- Roofing Material Recycling Process

MONITORING REQUIREMENTS

12. Asbestos Sampling: Conduct asbestos sampling of **each load** of roofing material received to meet all requirements of 40 CFR Part 61 Subpart M, National Emission Standard (NESHAP) for Asbestos and Appendix A to 40 CFR Part 61 Subpart M. Roofing materials shall not be processed in the grinding or crushing system unless the facility has determined asbestos content of the roofing material to be less than or equal to 1.0 percent, by weight.
[Rule 62-4.070(3), F.A.C., 40 CFR Part 61, Subpart M; Permit Application received December 20, 2013]

NOTIFICATION REQUIREMENTS

13. Test Notification: The permittee shall notify the EPD in writing at least 15 days prior to compliance test required in Specific Condition **7 and 8**. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.
[Rule 62-297.310(7)(a)9, F.A.C.]

RECORDS AND REPORTS

14. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(8), F.A.C.]
15. Monthly Recordkeeping Requirements. A log shall be kept for this facility to document compliance with the limitations of Specific Condition **2, 3, and 12**. The log shall be completed within thirty (30) days of the end of the month reported, and shall be retained on file at the facility for at least five (5) years. The log shall contain the following for each month:
- Month and year for which data was recorded;
 - Hourly totals of recycled asphalt product produced, in tons;
 - Laboratory analysis reports for roofing material asbestos content;
 - Roofing material origin address;
 - Date and approximate amount of roofing materials;
 - Name and address of roofing material supplier;
 - Records must be maintained for each load from which roofing materials are taken;
 - Records shall demonstrate that roofing materials do not contain asbestos; and
 - Records of the waste manifest for each load of asbestos-containing roofing material to document rejection of the incoming material.

[Rule 62-4.070(3), F.A.C.]

Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12-month totals using whatever number of months of data are available until such a time as a consecutive 12-month total can be maintained each month.

SECTION 4. APPENDIX A

Citation Formats and Glossary of Common Terms

CITATION FORMATS

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

Old Permit Numbers

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit
“AO” identifies the permit as an Air Operation Permit
“123456” identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located
“2222” represents the specific facility ID number for that county
“001” identifies the specific permit project number
“AC” identifies the permit as an air construction permit
“AF” identifies the permit as a minor source federally enforceable state operation permit
“AO” identifies the permit as a minor source air operation permit
“AV” identifies the permit as a major Title V air operation permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality
“FL” means that the permit was issued by the State of Florida
“317” identifies the specific permit project number

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

° **F:** degrees Fahrenheit

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System (DEP database)

BACT: best available control technology

SECTION 4. APPENDIX A

Citation Formats and Glossary of Common Terms

bhp: brake horsepower	MACT: maximum achievable control technology
Btu: British thermal units	MMBtu: million British thermal units
CEMS: continuous emissions monitoring system	MSDS: material safety data sheets
cfm: cubic feet per minute	MW: megawatt
CFR: Code of Federal Regulations	NESHAP: National Emissions Standards for Hazardous Air Pollutants
CAA: Clean Air Act	NO_x: nitrogen oxides
CMS: continuous monitoring system	NSPS: New Source Performance Standards
CO: carbon monoxide	O&M: operation and maintenance
CO₂: carbon dioxide	O₂: oxygen
COMS: continuous opacity monitoring system	Pb: lead
DARM: Division of Air Resource Management	PM: particulate matter
DEP: Department of Environmental Protection	PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less
Department: Department of Environmental Protection	ppm: parts per million
dscf: dry standard cubic feet	ppmv: parts per million by volume
dscfm: dry standard cubic feet per minute	ppmvd: parts per million by volume, dry basis
EPA: Environmental Protection Agency	QA: quality assurance
EPD: Orange County Environmental Protection Division	QC: quality control
EU: emissions unit	PSD: prevention of significant deterioration
F.A.C.: Florida Administrative Code	psi: pounds per square inch
F.A.W.: Florida Administrative Weekly	PTE: potential to emit
F.D.: forced draft	RACT: reasonably available control technology
F.S.: Florida Statutes	SAM: sulfuric acid mist
Fl: fluoride	scf: standard cubic feet
ft²: square feet	scfm: standard cubic feet per minute
ft³: cubic feet	SIC: standard industrial classification code
gpm: gallons per minute	SO₂: sulfur dioxide
gr: grains	TPD: tons/day
HAP: hazardous air pollutant	TPH: tons per hour
Hg: mercury	TPY: tons per year
I.D.: induced draft	UTM: Universal Transverse Mercator coordinate system
ID: identification	VE: visible emissions
kPa: kilopascals	VOC: volatile organic compounds
lb: pound	

SECTION 4. APPENDIX B

General Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are “permit conditions” and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that EPD will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by EPD.
3. As provided in subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and EPD rules, unless specifically authorized by an order from FDEP and EPD.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by EPD rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by EPD rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized EPD personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or EPD rules. Reasonable time may depend on the nature of the concern being investigated.
8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide EPD with the following information:
 - a. A description of and cause of noncompliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all

SECTION 4. APPENDIX B

General Conditions

damages which may result and may be subject to enforcement action by EPD for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to EPD may be used by EPD as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or EPD rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in EPD rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or EPD rules.
11. This permit is transferable only upon EPD approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by EPD.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (not applicable);
 - b. Determination of Prevention of Significant Deterioration (not applicable); and
 - c. Compliance with New Source Performance Standards (not applicable).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under EPD rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by EPD;
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by EPD rule;
 - c. Records of monitoring information shall include:
 - (1) The date, exact place, and time of sampling or measurements;
 - (2) The person responsible for performing the sampling or measurements;
 - (3) The dates the analyses were performed;
 - (4) The person responsible for performing the analyses;
 - (5) The analytical techniques or methods used;
 - (6) The results of such analyses.
15. When requested by EPD, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to EPD, such facts or information shall be corrected promptly.
16. All air pollution sources located in Orange County are subject to the Orange County Code of Ordinances, including Chapter 15, Article III, Air Quality Control.

SECTION 4. APPENDIX C

Common Conditions

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify EPD as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations.
[Rule 62-4.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly.
[Rule 62-210.650, F.A.C.]
3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 2 hours in any 24-hour period unless specifically authorized by EPD for longer duration. Pursuant to Rule 62-210.700(5), F.A.C., the permit subsection may specify more or less stringent requirements for periods of excess emissions. Rule 62-210-700(Excess Emissions), F.A.C., cannot vary or supersede any federal NSPS or NESHAP provision.
[Rule 62-210.700(1), F.A.C.]
4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]
5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by EPD.
[Rule 62-210.700(6), F.A.C.]
6. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by EPD.
[Rule 62-296.320(1), F.A.C.]
7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.
[Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

SECTION 4. APPENDIX C

Common Conditions

8. General Visible Emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4)(b)1, F.A.C.]
9. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary.
[Rule 62-296.320(4)(c), F.A.C.]

RECORDS AND REPORTS

10. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to EPD upon request.
[Rule 62-213.440(1)(b)2, F.A.C.]
11. Supporting Documentation: Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA “As Supplied” data sheets, EPA Method 24, etc.) shall be kept for each chemical and associated products, which includes sufficient information to determine usage rates and emissions. These records shall be made available to EPD upon request. Documentation of each chemical reclaimed will use a mass balance method to determine usage and emissions (amount used minus amount collected for disposal or recycle). The log and documents shall be kept at the facility for at least five years. Daily logs shall be completed within 7 business days.
[Rule 62-4.070(3), F.A.C.]
12. Emissions Computation and Reporting:
 - a. *Applicability*. This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit;
[Rule 62-210.370(1), F.A.C.]
 - b. *Computation of Emissions*. For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection:
 - (1) *Basic Approach*. The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit:

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Common Conditions

- (a) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to EPD that an alternative approach is more accurate because the CEMS represents still-emerging technology;
 - (b) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to EPD that an alternative approach is more accurate;
 - (c) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to EPD that an alternative approach is more accurate.
- (2) Mass Balance Calculations:
- (a) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
 - 1) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and
 - 2) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
 - (b) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate;
 - (c) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.
- (3) Emission Factors:
- (a) An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to EPD that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements:

SECTION 4. APPENDIX C

Common Conditions

- 1) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit;
 - 2) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed;
 - 3) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
- (b) If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- (4) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions;
 - (5) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit;
 - (6) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit;
 - (7) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to EPD for any regulatory purpose.

[Rule 62-210.370(2), F.A.C.]

c. *Annual Operating Report for Air Pollutant Emitting Facility:*

- (1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:
 - (a) All synthetic non-Title V sources;
 - (b) All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.

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(2) The annual operating report shall be submitted to EPD by April 1 of the following year. If the report is submitted using the FDEP electronic annual operating report software, there is no requirement to submit a copy to EPD;

(3) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.

[Rule 62-210.370(3), F.A.C.]

d. *Facility Relocation.* Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to EPD at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.

[Rule 62-210.370(4), F.A.C.]

SECTION 4. APPENDIX D
Common Testing Requirements

Unless otherwise specified in the permit, the following testing requirements apply to all emissions units at the facility.

COMPLIANCE TESTING REQUIREMENTS

1. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.
[Rule 62-297.310(2), F.A.C.]

2. Applicable Test Procedures - Opacity Compliance Tests: When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
 - a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time;
 - b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard;
 - c. The minimum observation period for opacity tests conducted by employees or agents of EPD to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.[Rule 62-297.310(4), F.A.C.]

3. Determination of Process Variables:
 - a. *Required Equipment*. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards;
 - b. *Accuracy of Equipment*. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.[Rule 62-297.310(5), F.A.C.]

4. Frequency of Compliance Tests: The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.
 - a. *General Compliance Testing*:
 - (1) The owner or operator of a new or modified emissions unit that is subject to an emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining an operation permit for such emissions unit;

SECTION 4. APPENDIX D
Common Testing Requirements

- (2) The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit;
- (3) The owner or operator shall notify EPD, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
- b. *Special Compliance Tests.* When EPD, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in an FDEP rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to EPD.

[Rule 62-297.310(7), F.A.C.]

RECORDS AND REPORTS

- 5. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with EPD on the results of each such test. The required test report shall be filed with EPD as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow EPD to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report shall provide the following information:
 - a. The type, location, and designation of the emissions unit tested;
 - b. The facility at which the emissions unit is located;
 - c. The owner or operator of the emissions unit;
 - d. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run;
 - e. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard;
 - f. The date, starting time and end time of the observation;
 - g. The test procedures used;
 - h. The names of individuals who furnished the process variable data, conducted the test, and prepared the report;
 - i. The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure;
 - j. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

FINAL DETERMINATION

PERMITTEE

Florida Roof Recycling, LLC
485 Commerce Way
Longwood, FL 32750

PERMITTING AUTHORITY

Orange County Environmental Protection Division
Air Quality Management
800 Mercy Drive, Suite 4
Orlando, Florida 32808

PROJECT

Air Permit No. 0951352-001-AC
Minor Source Air Construction Permit
Florida Roof Recycling, LLC

The purpose of this project is for initial construction of a roofing material recycling facility. The facility is proposing to install a primary and secondary hammer mill grinding system inside a partially enclosed building to process roofing materials into an asphaltic product to be used in the manufacture of road paving material.

NOTICE AND PUBLICATION

The EPD distributed a draft minor source air construction permit package on January 27, 2014. The applicant published the Public Notice in the Orlando Business Journal on January 31, 2014. The EPD received the proof of publication on February 03, 2014. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

COMMENTS

On February 11, 2014, the EPD received comments from the Central District Office. The following summarizes the comments and the EPD's response.

1. Comment on Test Notification Condition No. 13 to specify the required test.

Response: EPD specified the required test referenced in this condition and changed the wording as follows: "at least 15 days prior to ~~any required tests~~ compliance test required in Specific Condition 7 and 8."

2. Comment on Monthly Recordkeeping Requirement No. 15 (g.) states "Not all shingles will come from a building, some will come from a MRF or C&D disposal facility.

Response: EPD changed the wording as follows: "Records must be maintained for each ~~building~~ load from which roofing materials are taken."

3. Comment on Monthly Recordkeeping Requirement No. 15 (i.) states "The load will be rejected, not disposed by the facility."

Response: EPD changed the wording as follows: "Records of the waste manifest for each load of asbestos-containing roofing material to document ~~proper disposal~~ rejection of the incoming material."

4. Comment on New Facility Address.

Response: EPD updated facility address on page 1 of 7 and in ARMS database.

CONCLUSION

The final action is to issue the permit with the minor changes, corrections and clarifications as described above.